



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

JUL 06 2009

Sandra Stiles
US Army Corps of Engineers
New Orleans District
P.O. Box 60267
New Orleans, LA 70160-0267

Dear Mr. Stiles:

In accordance with our responsibilities under Section 309 of the Clean Air Act, the National Environmental Policy Act (NEPA), and the Council on Environmental Quality (CEQ) Regulations for Implementing NEPA, the Region 6 Office of the U.S. Environmental Protection Agency (EPA) has completed the review of the Draft Supplemental Environmental Impact Statement (DSEIS) for the Dredged Material Management Plan (DMMP) for the Calcasieu River and Pass, Louisiana. Currently, the project does not have the adequate DMMP needed to maintain the channel to authorized depths. Alternative B is the Tentatively Selected Plan since it meets the project goals, is the lowest cost, and is consistent with sound engineering practices and Federal environmental standards.

EPA classifies your Draft EIS and proposed action, Alternative B, as "LO" i.e., EPA has "Lack of Objections." We have enclosed some detail comments for your consideration to strengthen the Final Supplemental EIS. Our classification will be published in the Federal Register according to our responsibility under Section 309 of the Clean Air Act, to inform the public of our views on proposed Federal actions. If you have any questions, please contact Mike Jansky of my staff at (214)-665-7451 or by e-mail at jansky.michael@epa.gov for assistance.

We appreciate the opportunity to review the Draft EIS. We request that you send our office one (1) copy of the Final SEIS at the same time that it is sent to the Office of Federal Activities (2251A), EPA, 1200 Pennsylvania Avenue, N.W., Washington, D.C. 20044.

Sincerely yours,

A handwritten signature in cursive script that reads "Cathy Gilmore".

Cathy Gilmore
Chief, Office of Planning
and Coordination (6ENXP)

Enclosure

JUL 06 2009

**DETAILED COMMENTS
ON THE
DRAFT ENVIRONMENTAL IMPACT STATEMENT
CALCASIEU RIVER AND PASS, LOUISIANA
DREDGED MATERIAL MANAGEMENT PLAN**

EPA Region 6 has completed a review of the May 22, 2009, Draft Calcasieu River and Pass, Louisiana, Dredged Material Management Plan and Supplemental Environmental Impact Statement. As explained in this analysis, there is currently inadequate dredged material disposal capacity to maintain the Calcasieu Ship Channel to the authorized depths. Accordingly, this document establishes a new strategy for managing dredged materials through operation and maintenance of the ship channel and berthing areas for a minimum of an additional 20 years.

With regard to the alternatives analyses in the Supplemental Environmental Impact Statement, we agree with the decision to eliminate from further consideration Alternative D, which calls for material dredged from south of Channel Mile 22 to be disposed in the Ocean Dredged Material Placement Site (ODMDS). We support the Corps' efforts to use as much of the suitable material as possible for vital coastal enhancement, restoration, or creation rather than placing the material in ODMDS.

The Tentatively Selected Plan, Alternative B, targets the use of confined disposal sites and designates specific eroded and subsided coastal wetlands for beneficial use, which could result in an estimated 6,306 acres of marsh and estuarine habitat creation or nourishment. While Alternative C could result in an estimated 14% more dredged material used beneficially, the constraints of real estate acquisition, maintenance of existing confined placement facilities, and other practical considerations make it a somewhat less viable management alternative at this time. However, we strongly support the strategy incorporated into Alternative B in which beneficial use sites will be scheduled to receive material prior to placement in the confined disposal sites. This would allow for the possibility, under Alternative B, of utilizing some of the additional beneficial use sites identified in Alternative C during future updates to the Dredged Material Management Plan. Maintaining flexibility in the Dredged Material Management Plan is essential in light of the rapid pace of evolving regulatory and financial options for utilizing dredged material to restore and sustain the degrading Gulf coastal landscape. We strongly encourage the Corps to use as much of the material as possible dredged during each and every dredging event for purposes of coastal habitat creation or restoration. This material is simply too valuable to the ecosystem to do otherwise. Thank you for the opportunity to participate in this review. Please call if you any questions.

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